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Attorneys for Defendant  
Nga Tuy Pham, Debtor

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re NGA TUY PHAM,  
Debtor

Case No. 08-30904  
Chapter 7

NGOC LAN THI NGUYEN,  
Plaintiff

Adversary Proceeding  
No. 08-3073 TC

vs.

**JOINT SUPPLEMENTAL  
CASE MANAGEMENT STATEMENT**

NGA TUY PHAM, YEN CHUNG,  
KENNY HUNG WAI NG, QUAN  
THANH CHUNG, and DOES 1-20,  
Defendants.

Date: March 20, 2009  
Time: 9:30 a.m.  
Place: 235 Pine Street, 23<sup>rd</sup> Floor Courtroom  
Honorable Thomas E. Carlson

The parties to the above-entitled action certify that they met and conferred and

Joint Supplemental Case Management Statement  
Adversary Proceeding No. 08-3073 TC

1 jointly submit this Supplemental Case Management Statement and Proposed Order and request the  
2 Court to adopt it as a Supplemental Case Management Order in this case.

3 DESCRIPTION OF SUBSEQUENT CASE DEVELOPMENTS

4 1. The following progress or changes have occurred since the Joint Supplemental Case  
5 Management Statement of January 27, 2009:

6 (a) Discovery

7 The parties have exchanged requests for production of documents and interrogatories.  
8 Written responses have been served to some of the requests and interrogatories. The time to  
9 respond to the remaining interrogatories, document requests and requests for admissions has been  
10 extended by stipulation, so that all discovery, other than expert's discovery, will be completed by  
11 April 15, 2009.

12 The parties request an extension of the fact discovery cut-off in the Scheduling Order to  
13 April 15, 2009.

14 The parties request that the deadline for expert's reports in the Scheduling Order be  
15 extended to April 21, 2009.

16 There have been no depositions to date.

17 (b) Motions

18 There have been no motions since the Joint Supplemental Case Management Statement of  
19 January 27, 2009.

20 (c) Pleadings

21 The parties are considering submission of an Amended Answer and Second Amended  
22 Complaint by stipulation, pending the resolution of settlement discussions.

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24 //

1 (d) ADR

2 The mediation occurred on February 12, 2009 at the offices of Andrea Porter. No  
3 agreement was reached. The parties have been discussing potential resolution of part of the case  
4 since the mediation.

5 2. The parties jointly request that the Court make the following Supplemental Case  
6 Management Order:

7 (a) The Status Conference scheduled for March 20, 2009 shall be rescheduled for April 17,  
8 2009.

9 (b) The Scheduling Order of September 25, 2008 shall be modified as follows:

10 (i) All discovery shall be completed by April 15, 2009, other than expert's discovery.

11 (ii) Reports of retained experts are due from both plaintiff and defendants by April 21,  
12 2009.

13 Dated: March 18, 2009

14 Respectfully submitted:

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21 /s/ Robin E. Foor  
22 Robin E. Foor  
23 Attorney for Plaintiff  
24 Ngoc Lan Thi Nguyen  
25

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6 Attorneys for Defendant  
Nga Tuy Pham, Debtor  
7

8 /s/ John Chow

John Chow  
Attorney for Defendant  
9 Nga Tuy Pham, Debtor  
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